

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

JAMES E. SHELTON  
v.  
HEAVY FLUCE INC

NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

-----X

TO: Opposing Counsel

CC: Ralph Cohen  
1854 E 4th St.  
Brooklyn, NY 11223

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and  
the Certificate(s) of Good Standing annexed thereto, I ANDREW ROMAN PERRONG will move this

Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York for an order allowing the admission of movant, a  
member of the firm of PERRONG LAW LLC and a member in good standing of  
the bar(s) of the State(s) of PENNSYLVANIA, as attorney *pro hac*

*vice* to argue or try this case in whole or in part as counsel for

JAMES E. SHELTON. There are no pending disciplinary  
proceedings against me in any state or federal court. (If there are any disciplinary proceedings,  
describe them.)

Respectfully submitted,



Dated: APRIL 19 2024

Signature of Movant

Firm Name PERRONG LAW LLC

Address 2657 MOUNT CARMEL AVE  
GLENSIDE, PA 19038

Email A@PERRONGLAW.COM

Phone 215-225-5529